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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ROBERT
BERNASCONI IN SUPPORT OF
REORGANIZED DEBTORS' ONE
HUNDRED TENTH OMNIBUS
OBJECTION TO CLAIM NOS.
76018 AND 78381 (GREENBERG
CLAIMS)**

**Response Deadline:
November 9, 2021, 4:00 p.m. (PT)**

**Hearing Information If Timely
Response Made:**

Date: November 23, 2021
Time: 10:00 a.m. (Pacific Time)
Place: (Tele/Videoconference
Appearances Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Robert Bernasconi, pursuant to Section 1746 of Title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:

4 1. I have been employed with ARB as a field engineer since 2009. I submit this
5 Declaration in support of the *Reorganized Debtors' One Hundred Tenth Omnibus Objection to*
6 *Claims (Greenberg Claims)* (the “**Objection**”), filed contemporaneously herewith.

7 2. Except as otherwise indicated herein, all facts set forth in this Declaration are
8 based upon my personal knowledge and my review of relevant documents and information. If
9 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
10 authorized to submit this declaration on behalf of the Reorganized Debtors.

11 3. In October 2019 I was involved with ARB’s work at 47 Bolinas Road, Fairfax,
12 California (the “**Property**”) to install gas lines from the meter to the house underneath the deck.
13 Before beginning work, I noticed that the existing deck was in poor condition and showed
14 evidence of damage from tree roots.

15 4. In lieu of open trenching, we utilized a method called “dry bore” to install the gas
16 lines on the Property. This method involved digging a hole 40 inches deep (rather than the
17 required 18-24 inches) behind the gate at the rear of the driveway and in front of the deck in order
18 to avoid any contact with the deck and/or tree roots underneath the deck.

19 5. We dug another 40-inch deep hole near the right side of the house, and a “piercing
20 tool” (similar to a pneumatic missile) was then deployed at the 40-inch depth in order to install
21 the gas lines.

22 6. The gas lines were installed successfully and the deck on the Property was neither
23 contacted nor damaged during the course of this work.

24 7. Greenberg praised the work that was performed by myself and other ARB
25 employees, telling us that we had done a “great job.”

26 8. I took five photographs in October 2019 during the work performed by ARB as
27 described above, true and correct copies of which are attached collectively as **Exhibit A** hereto.
28

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct to the best of my knowledge, information, and belief. Executed this 13TH day of
3 October, 2021.

4 
5 Robert Bernasconi